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*Co-Lead Class Counsel for Indirect-Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE TFT-LCD (FLAT PANEL)	)	Case No. 3:07-MD-1827 SI
ANTITRUST LITIGATION	)	MDL No. 1827
	)	
This Document Relates to:	)	<b>[PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION</b>
All Indirect-Purchaser Actions;	)	
	)	
<i>State of Missouri, et al. v. AU Optronics</i>	)	
<i>Corporation, et al.</i> , Case No. 10-cv-3619;	)	
	)	
<i>State of Florida v. AU Optronics Corporation,</i>	)	The Honorable Susan Illston
<i>et al.</i> , Case No. 10-cv-3517; and	)	
	)	
<i>State of New York v. AU Optronics Corporation,</i>	)	
<i>et al.</i> , Case No. 11-cv-0711.	)	
	)	

1        WHEREAS, on December 27, 2011, the Court granted final approval to settlements  
 2 between the Indirect-Purchaser Plaintiffs (“IPPs”) and the States of Arkansas, California,  
 3 Florida, Michigan, Missouri, New York, West Virginia, and Wisconsin (“Settling States”) on the  
 4 one hand, and defendants Chimei, Chunghwa, Epson, HannStar, Hitachi, Samsung and Sharp, as  
 5 identified in the respective Settlement Agreements, and inclusive of related entities also  
 6 identified in the respective Settlement Agreements (collectively, “Group-I Settling Defendants”),  
 7 on the other hand; and

8        WHEREAS, on July 30, 2012, the Court granted preliminary approval to the settlements  
 9 between IPPs and the Settling States, and defendants AUO, LG and Toshiba, as identified in the  
 10 respective Settlement Agreements (collectively, “Group-II Settling Defendants” and with the  
 11 Group-I Settling Defendants referred to hereafter as “All Settling Defendants”), on the other  
 12 hand; and

13        WHEREAS, the Settlement Agreements with All Settling Defendants provide that the  
 14 costs of administration of the claims process shall be paid from the Settlement Fund of each  
 15 Settling Defendant, *pro rata*, based on each Settling Defendant’s Settlement Amount; and

16        WHEREAS, the cost of claims administration invoiced by Rust Consulting is  
 17 \$183,916.55 (see Exhibit 1 attached hereto); and

18        WHEREAS, pursuant to the Settlement Agreements the following amounts may be  
 19 deducted from each Settling Defendant’s Settlement Fund to pay such costs of claims  
 20 administration:

Chimei	\$17,843.11
Chunghwa	\$901.71
Epson	\$484.41
HannStar	\$4,359.72
Hitachi	\$6,624.94
Samsung	\$40,792.70
Sharp	\$19,631.49
AUO	\$27,450.09

LG	\$61,359.02
<u>Toshiba</u>	<u>\$3,569.36</u>
<b>TOTAL</b>	<b>\$183,916.55</b>

WHEREAS, Well Fargo Bank, N.A. has informed the parties that it requires an order from the Court before it will distribute payment for these additional costs;

THEREFORE, IT IS HEREBY ORDERED that Wells Fargo Bank, N.A. shall wire \$183,916.55 to the following account:

Bank of Texas  
ABA/Routing # 111014325  
Account # 8093434387  
Account Name: Rust Consulting  
Reference # 128325  
Federal Tax ID # 41-1813634  
Bank Contact: Mayra Landeros, (214) 987-8817

The balance of funds in the demand-deposit account, if any, shall be retained for additional costs as they are incurred.

## **IT IS SO ORDERED.**

Dated: Oct. 23, 2013

Susan Illston

Hon. Susan Illston  
United States District Judge

3249408v1

# EXHIBIT 1



# Invoice

625 MARQUETTE AVENUE, SUITE 880  
 MINNEAPOLIS, MN 55402  
 P 612.359.2000 I F 612.359.2050  
 WWW.RUSTCONSULTING.COM  
 FEDERAL ID #: 41-1813634

DATE: 09/16/13  
 INVOICE #: 138593  
 MATTER #: 8292

**TO:** Francis O. Scarpulla  
 Zelle Hofmann Voelbel & Mason LLP  
 44 Montgomery Street  
 Suite 3400  
 San Francisco, CA 94104  
[fscarpulla@zelle.com](mailto:fscarpulla@zelle.com)  
[jdc@coopkirk.com](mailto:jdc@coopkirk.com)

PROJECT
<i>LCD Indirect</i>
<i>August 2013 Claims Administration Services</i>

Project Database	\$ 2,554.53
Project Management	12,999.73
Technical Consulting	445.90
Email Notification	156.20
Website Modification	545.60
Document Receipting	115.02
Claim Forms Submitted (355 @ \$0.15 each)	53.25
Scanning	174.96
Correspondence/Admin Mail	2,179.50
Data Capture	2,400.84
Return Mail Processing	17.28
Claims Validation & Audits	24,047.22
Deficiency Claim Processing	11,221.00
Deficiency Notification	9,792.55
Mailroom & Data Capture Management	83.16
Call Center Support	<u>3,972.36</u>
<b>SUBTOTAL</b>	<u>70,759.10</u>

Expenses: Other Charges and Out-of-Pocket Costs	
Call Center/Telecommunications	4,863.75
Postage/Federal Express	866.41
Shredding/Storage	785.86
Photocopies/Faxing/Printing	530.00
Website Hosting	275.00
<b>SUBTOTAL</b>	<u>7,321.02</u>

**TOTAL INVOICE** \$ 78,080.12

**OUTSTANDING INVOICE(s)** \$ 105,836.43

**TOTAL DUE** \$ 183,916.55

#### PAYMENT TERMS: NET DUE UPON RECEIPT

#### WIRE INFORMATION

ACCOUNT #: 8093434378  
 ABA/ROUTING # WIRE or ACH: 111014325  
 BANK: BANK OF TEXAS, DALLAS, TX 75225  
 BANK CONTACT: MAYRA LANDEROS 214.987.8817  
 REFERENCE: INVOICE NUMBER

#### RUST

PAYMENT MAILING ADDRESS:  
 P O BOX 142589  
 DRAWER #9051  
 Irving, TX 75014-2589



DATE: 09/16/13  
 INVOICE #: 138593  
 MATTER #: 8292

### STATEMENT OF ACCOUNT

Current Invoice Period: August 2013 Claims Administration Services

<b>Total Current Invoice</b>	\$ 78,080.12
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#### OUTSTANDING INVOICES:

Date	Invoice #	Amount	Payments	Balance
08/14/13	138486	105,836.43		105,836.43

PREVIOUS BALANCE DUE	\$ 105,836.43
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<b>Total Amount Due</b>	\$ 183,916.55
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#### WIRE INFORMATION

ACCOUNT #: 8093434387  
 ABA/ROUTING # WIRE or ACH: 111014325  
 BANK: BANK OF TEXAS, DALLAS, TX 75225  
 BANK CONTACT: MAYRA LANDEROS 214.987.8817  
 REFERENCE: INVOICE NUMBER

#### RUST

PAYMENT MAILING ADDRESS:  
 P O BOX 142589  
 DRAWER #9051  
 Irving, TX 75014-2589

#### PAYMENT TERMS: NET DUE UPON RECEIPT

Inv# 138593  
 Date Sep 16, 2013  
 Client Number 8292

Zelle Hofmann Voelbel & Mason LLP  
 44 Montgomery Street  
 Suite 3400  
 San Francisco, CA 94104  
 fscarpulla@zelle.com  
 jdc@coopkirk.com

Re: LCD Indirect - Project Database 829202

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEES
Carol Osborne	CO	141.00	0.03	4.23
Christy Gilman	CG	188.00	0.30	56.40
Cynthia Romero	CR	175.00	2.60	455.00
Greg Brown	GSB	141.00	0.10	14.10
Gregory Sartor	GWS	185.00	0.10	18.50
Joel Cooper	JC	100.00	2.70	270.00
Jose Rivera	JR	142.00	2.40	340.80
Juan Carlos Quiroz	JQ	175.00	1.40	245.00
Justin Honse	JH	164.00	1.50	246.00
Roso Suarez	RS	185.00	4.50	832.50
Tracey Rolle	TR	80.00	0.90	72.00
Total Fees:				2,554.53

Total Services	2,554.53
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Total Expenses	.00
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Total This Matter	2,554.53
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Inv# 138593  
 Date Sep 16, 2013  
 Client Number 8292

Re: LCD Indirect - Project Management

829206

For Professional Services Rendered:

TIMEKEEPER	RATE	HOURS	FEES
April Hyduk	AH 192.00	7.79	1,495.68
Doreen McGinley	DM 125.00	6.70	837.50
Jose Rivera	JR 142.00	31.70	4,501.40
Justin Honse	JH 164.00	7.20	1,180.80
Kenneth Rivera	KR 90.00	15.40	1,386.00
Mary Schoenherr	MS 125.00	9.00	1,125.00
Robin Niemiec	RN 199.00	9.10	1,810.90
Sylvia Nettles	SN 93.00	1.25	116.25
Taryn Diddle	TD 54.00	0.69	37.26
Travis Duarte	TD 54.00	8.11	437.94
Virginia Ponzini	VP 142.00	0.50	71.00

Total Fees: 12,999.73

Total Services 12,999.73

Total Expenses .00

Total This Matter 12,999.73

Inv# 138593  
Date Sep 16, 2013  
Client Number 8292

Re: LCD Indirect - Technical Consulting

829207

For Professional Services Rendered:

TIMEKEEPER	RATE	HOURS	FEES
Hai Bui	HB 141.00	0.50	70.50
Lee Anderson	LA 141.00	2.40	338.40
Roso Suarez	RS 185.00	0.20	37.00
Total Fees:			445.90

Total Services 445.90

Total Expenses .00

Total This Matter 445.90

Inv# 138593  
Date Sep 16, 2013  
Client Number 8292

Re: LCD Indirect - Email Notification 829212

**For Professional Services Rendered:**

TIMEKEEPER	RATE	HOURS	FEES	
Jose Rivera	JR	142.00	1.10	156.20
Total Fees:				156.20

Total Services 156.20

Total Expenses	.00
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Total This Matter	156.20

Inv# 138593  
Date Sep 16, 2013  
Client Number 8292

Re: LCD Indirect - Website Modification

829223

For Professional Services Rendered:

TIMEKEEPER	RATE	HOURS	FEES
Jose Rivera	JR 142.00	2.80	397.60
Roso Suarez	RS 185.00	0.80	148.00
Total Fees:			545.60

Total Services 545.60

Total Expenses	.00
Total This Matter	545.60

Inv# 138593  
Date Sep 16, 2013  
Client Number 8292

Re: LCD Indirect - Document Receipting 829230

For Professional Services Rendered:

TIMEKEEPER	RATE	HOURS	FEES
Processor	244	244	54.00
Total Fees:			2.13 115.02

Total Services 115.02

Total Expenses .00  
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Total This Matter 115.02  
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Inv# 138593  
Date Sep 16, 2013  
Client Number 8292

Re: LCD Indirect - Scanning

829231

For Professional Services Rendered:

TIMEKEEPER	RATE	HOURS	FEES
Scan Image Processor	144	54.00	3.24

Total Fees: 174.96

Total Services 174.96

Total Expenses .00

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Total This Matter 174.96

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Inv# 138593  
Date Sep 16, 2013  
Client Number 8292

Re: LCD Indirect - Correspondence/Admin Mail 829232

For Professional Services Rendered:

TIMEKEEPER	RATE	HOURS	FEES
Doreen McGinley	DM 125.00	16.30	2,037.50
Jose Rivera	JR 142.00	1.00	142.00

Total Fees: 2,179.50

Total Services 2,179.50

Total Expenses .00  
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Total This Matter 2,179.50  
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Inv# 138593  
Date Sep 16, 2013  
Client Number 8292

Re: LCD Indirect - Data Capture 829234

For Professional Services Rendered:

TIMEKEEPER	RATE	HOURS	FEES
Data Capture Processor	144	54.00	0.71
Doreen McGinley	DM	125.00	18.90
			38.34
			2,362.50

Total Fees: 2,400.84

Total Services 2,400.84

Total Expenses .00  
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Total This Matter 2,400.84  
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Inv# 138593  
Date Sep 16, 2013  
Client Number 8292

Re: LCD Indirect - Return Mail Processing 829235

For Professional Services Rendered:

TIMEKEEPER	RATE	HOURS	FEES
Mailroom Processor	151144	54.00	0.32

Total Fees: 17.28

Total Services 17.28

Total Expenses .00

Total This Matter 17.28

Inv# 138593  
 Date Sep 16, 2013  
 Client Number 8292

Re: LCD Indirect - Claims Validation & Audits 829236

For Professional Services Rendered:

TIMEKEEPER	RATE	HOURS	FEES
April Hyduk	AH 192.00	0.60	115.20
JoAnn Calderin	JC 90.00	10.85	976.50
Jose Rivera	JR 142.00	14.10	2,002.20
Juliana Calderin	JC 54.00	41.23	2,226.42
Justin Honse	JH 164.00	15.70	2,574.80
Kenneth Rivera	KR 90.00	79.40	7,146.00
Mary Schoenherr	MS 125.00	3.00	375.00
Sean Combs	SC 90.00	2.00	180.00
Sutton Link	SL 142.00	5.80	823.60
Taryn Diddle	TD 54.00	29.52	1,594.08
Travis Duarte	TD 54.00	111.73	6,033.42

Total Fees: 24,047.22

Total Services 24,047.22

Total Expenses .00

Total This Matter 24,047.22

Inv# 138593  
Date Sep 16, 2013  
Client Number 8292

Re: LCD Indirect - Deficiency Claim Processing 829237

For Professional Services Rendered:

TIMEKEEPER	RATE	HOURS	FEES
Doreen McGinley	DM 125.00	75.20	9,400.00
Jose Rivera	JR 142.00	11.90	1,689.80
Justin Honse	JH 164.00	0.80	131.20

Total Fees: 11,221.00

Total Services 11,221.00

Total Expenses .00  
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Total This Matter 11,221.00  
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Inv# 138593  
 Date Sep 16, 2013  
 Client Number 8292

Re: LCD Indirect - Deficiency Notification 829238

For Professional Services Rendered:

TIMEKEEPER	RATE	HOURS	FEES
Bjorn Bergh	BB 141.00	0.60	84.60
Brittany Flom	BF 141.00	1.61	227.01
Carol Osborne	CO 141.00	0.55	77.55
Christy Gilman	CG 188.00	1.00	188.00
Cynthia Romero	CR 175.00	2.80	490.00
Doreen McGinley	DM 125.00	0.40	50.00
Edgar Garcia	EG 163.00	1.00	163.00
Elizabeth Sammons	ES 121.00	3.76	454.96
Gregory Sartor	GWS 185.00	4.00	740.00
Jose Rivera	JR 142.00	20.60	2,925.20
Juan Carlos Quiroz	JQ 175.00	1.40	245.00
Julie Zitzmann	JZ 121.00	0.95	114.95
Justin Honse	JH 164.00	6.00	984.00
Lourdes Millan	LM 163.00	2.50	407.50
Lucretia Hassing	LH 121.00	3.87	468.27
Michelle Lara	ML 121.00	1.56	188.76
Rebecca Howe	RH 163.00	1.50	244.50
Roso Suarez	RS 185.00	5.40	999.00
Samuel Vasquez	SV 163.00	1.75	285.25
Shane McDonald	SM 175.00	2.60	455.00

Total Fees: 9,792.55

Total Services 9,792.55

Total Expenses .00

Total This Matter 9,792.55

Inv# 138593  
Date Sep 16, 2013  
Client Number 8292

Re: LCD Indirect - Mailroom & Data Capture Management 829239

For Professional Services Rendered:

TIMEKEEPER	RATE	HOURS	FEES
Mailroom Processor 151144	54.00	1.44	77.76
Samantha Malinowski SM	54.00	0.10	5.40
Total Fees:			83.16

Total Services 83.16

Total Expenses	.00
Total This Matter	83.16

Inv# 138593  
Date Sep 16, 2013  
Client Number 8292

Re: LCD Indirect - Call Center Support 829247

For Professional Services Rendered:

TIMEKEEPER	RATE	HOURS	FEES
CSR 240	52.00	2.18	113.36
Doreen McGinley	125.00	0.20	25.00
Jose Rivera	142.00	27.00	3,834.00

Total Fees: 3,972.36

Total Services 3,972.36

Total Expenses .00  
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Total This Matter 3,972.36  
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Inv# 138593  
 Date Sep 16, 2013  
 Client Number 8292

Re: LCD Indirect - Expenses

829290

For Professional Services Rendered:

Expense Detail:

Reference	Date	Description	Amount
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<b>Call Center/Telecommunications</b>			
08/31/13	Long Distance	3512 Minutes	421.44
08/31/13	Advanced Features		0.55
08/31/13	IVR	2623.23 Minutes	1,101.76
08/31/13	IVR System Charge		250.00
08/31/13	Live Call Center Support; 257 Calls		2,960.00
08/31/13	Line Maintenance Charge Schedule		130.00
		Subtotal	4,863.75
<b>Postage/Federal Express</b>			
08/30/13	Metered Postage;	254 pieces	147.04
08/30/13	Postage;	1559 pieces	717.14
08/30/13	Weekly Mail Pickup		1.77
08/30/13	Metered Postage;	1 piece	0.46
		Subtotal	866.41
<b>Shredding/Storage</b>			
08/31/13	Data Storage August 2013		681.86
08/31/13	Storage and/or Shredding	43 Boxes	86.00
08/31/13	Storage and/or Shredding	9 Boxes	18.00
		Subtotal	785.86
<b>Photocopies/Faxing/Printing</b>			
08/31/13	Photocopies/Faxing/Printing	;2650	530.00
		Subtotal	530.00
<b>Website Hosting</b>			
08/31/13	Web Monitor & Host		275.00
		Subtotal	275.00

Inv# 138593  
Date Sep 16, 2013  
Client Number 8292

Total Expenses	7,321.02
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Total This Matter	7,321.02
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